FILED

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MICHAEL W. DOBBINS CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA vs.)	No. 11CR 0025
vs.)	Title 29, United States Code,
SYLVESTER J. KNIGHT)	Section 439(c)

MAGISTRATEJUDGE COLE

The UNITED STATES ATTORNEY charges:

- 1. At times material to this information:
- (a) The Steelworkers AFL-CIO Local Union 2154 (the "Union") was a labor organization engaged in an industry affecting commerce within the meaning of Title 29, United States Code, Sections 402(a), (i), and (j).
- (b) Defendant SYLVESTER J. KNIGHT ("KNIGHT") was the treasurer of the Union. In this capacity, defendant KNIGHT was responsible for, among other things, maintaining the Union's financial records, the payment of bills on behalf of the Union, and the issuance of checks for the Union. Defendant KNIGHT was one of two signatories on the Union's bank account.
- From on or about December 17, 2008, and continuing to on or about March 25,
 2009, at Chicago, in the Northern District of Illinois, Eastern Division,

SYLVESTER J. KNIGHT,

defendant herein, willfully made false entries in books and records of the Union required to be kept pursuant to Title 29, United States Code, Section 436, namely, false expense Case: 1:11-cr-00025 Document #: 1 Filed: 01/11/11 Page 2 of 2 PageID #:2

vouchers in order to conceal defendant's embezzlement of funds from the Union;
In violation of Title 29, United States Code, Section 439(c).

Valnick . Fitzgereld by UNITED STATES ATTORNEY